

EXHIBIT D

REDACTED

From: Anna Porto
Sent: Friday, July 2, 2021 6:26 PM
To: Thompson, Michael; singular@princetonobel.com
Cc: kvp-singular; wgs-singularv.google@wolfgreenfield.com; abhansali@kblfirm.com; mkwun@kblfirm.com
Subject: RE: Singular Computing LLC v. Google LLC; Civil Action No. 1:19-cv-12551 FDS

Counsel,

I write to summarize our discussion of **Singular's** recent discovery responses. Please let us know **Singular's** positions on the outstanding issues listed below, and inform us if any of the summary below is incorrect.

- **Rog 19:** Singular plans to supplement its response and will confirm after its meeting with [REDACTED] next Wednesday.
- **Rog 21:** Singular will let us know whether it is permitted to further identify the government agencies responsive to this interrogatory.
- **Rogs 22, 23, & 24:** Singular will not identify where in the Patents-in-Suit the number formats referenced in Interrogatory Nos. 22, 23, and 24 are disclosed, nor will Singular identify any specific pages of any presentations where these number formats were disclosed.
- **Rog 26:** Singular has objected that this interrogatory is based on a “**flawed premise**” because Singular does not contend that the program compiled from the FAC Testing Source Code is an accurate model of the “**TPU's float32 multiplication operation**” (see FAC at ¶ 94). But Singular has refused to supplement its response to this interrogatory to state as much.
- **Rog 30:** Singular is considering supplementing its response regarding venture funding. As we discussed, there are examples of documents where Dr. Bates referred to venture funding. See SINGULAR-00025909 (Bates presentation stating “[REDACTED]”); SINGULAR-00012893 (“[REDACTED]”); SINGULAR-00010740 (“[REDACTED]”).
- **RFP No. 82:** Singular said that it would not produce documents related to **Singular's** S2. In light of documents describing the S2 as the “[REDACTED]”, see SINGULAR-00010709, please let us know if **you'll** reconsider your position that the S2 is irrelevant.
- **RFP No. 85:** Singular will confirm whether there is additional emulator code to be produced.
- **RFP No. 86:** Singular will confirm whether there are photos of Dr. **Bates'** S1 markup.
- **RFA Nos. 2 & 8:** Singular maintains that it lacks sufficient information to respond to these RFAs in the absence of the **Court's** claim construction order. Though we understand your position with respect to RFA No. 8, we do not know of any pending claim construction issue that bears on **Singular's** response to RFA No. 2. Therefore, please identify which of the briefed and argued pending claim construction issues you think bears on **Singular's** response.

Best,
Anna

From: Thompson, Michael <mthompson@princetonobel.com>
Sent: Thursday, July 1, 2021 10:47 AM
To: Anna Porto <APorto@keker.com>; singular@princetonobel.com
Cc: kvp-singular <kvpsingular@keker.com>; wgs-singularv.google@wolfgreenfield.com; abhansali@kblfirm.com; mkwun@kblfirm.com
Subject: RE: Singular Computing LLC v. Google LLC; Civil Action No. 1:19-cv-12551 FDS

[EXTERNAL]

Thanks, Anna.

Michael Thompson

Prince Lobel Tye LLP
One International Place, Suite 3700
Boston, Massachusetts 02110

(617) 456 8124 Direct
mthompson@princelobel.com

From: Anna Porto [<mailto:aporto@keker.com>]
Sent: Thursday, July 1, 2021 12:42 PM
To: Thompson, Michael <mthompson@princelobel.com>; Singular <Singular@princelobel.com>
Cc: kvpsingular@keker.com; wgs-singularv.google@wolfgreenfield.com; abhansali@kblfirm.com; mkwun@kblfirm.com
Subject: RE: Singular Computing LLC v. Google LLC; Civil Action No. 1:19-cv-12551 FDS

Thanks, Michael. 12:30 ET tomorrow works. Dial-in info is below.

Meeting ID: 811 3202 1678
One tap mobile
+16699009128,,81132021678# US (San Jose)
+12532158782,,81132021678# US (Tacoma)

Dial by your location
+1 669 900 9128 US (San Jose)
+1 253 215 8782 US (Tacoma)
+1 346 248 7799 US (Houston)
+1 301 715 8592 US (Washington DC)
+1 312 626 6799 US (Chicago)
+1 646 558 8656 US (New York)
877 853 5247 US Toll-free
888 788 0099 US Toll-free
Meeting ID: 811 3202 1678
Find your local number: <https://keker.zoom.us/j/kdjFxJc3ns>

From: Thompson, Michael <mthompson@princelobel.com>
Sent: Thursday, July 1, 2021 9:09 AM
To: Anna Porto <APorto@keker.com>; singular@princelobel.com
Cc: kvp-singular <kvpsingular@keker.com>; wgs-singularv.google@wolfgreenfield.com; abhansali@kblfirm.com; mkwun@kblfirm.com
Subject: RE: Singular Computing LLC v. Google LLC; Civil Action No. 1:19-cv-12551 FDS

[EXTERNAL]

Anna,

Following up on the below, we are available to meet and confer on the issues raised in your letter tomorrow, July 2, between 12:30 and 4:00 pm Eastern. Let us know what works on your end.

Regards,
Michael

Michael Thompson

Prince Lobel Tye LLP
One International Place, Suite 3700
Boston, Massachusetts 02110

(617) 456 8124 Direct
mthompson@princelobel.com

From: Thompson, Michael
Sent: Wednesday, June 30, 2021 11:19 AM
To: Anna Porto <aporto@keker.com>; Singular <Singular@princelobel.com>
Cc: kvpsingular@keker.com; wgs-singularv.google@wolfgreenfield.com; abhansali@kblfirm.com; mkwun@kblfirm.com
Subject: RE: Singular Computing LLC v. Google LLC; Civil Action No. 1:19-cv-12551 FDS

Anna,

We are not available today, but will get you some times that we are available tomorrow and Friday.

Regards,
Michael

Michael Thompson

Prince Lobel Tye LLP
One International Place, Suite 3700
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mthompson@princelobel.com

From: Anna Porto [mailto:aporto@keker.com]
Sent: Wednesday, June 30, 2021 11:00 AM
To: Singular <Singular@princelobel.com>

Cc: kvpsingular@keker.com; wgs-singularv.google@wolfgreenfield.com; abhansali@kblfirm.com; mkwun@kblfirm.com
Subject: RE: Singular Computing LLC v. Google LLC; Civil Action No. 1:19-cv-12551 FDS

Counsel,

Please let us know if **you're** available at 11am or 1pm PT today.

Thanks,
Anna

From: Anna Porto
Sent: Tuesday, June 29, 2021 11:42 AM
To: singular@princelobel.com
Cc: kvp-singular <kvpsingular@keker.com>; wgs-singularv.google@wolfgreenfield.com; abhansali@kblfirm.com; mkwun@kblfirm.com
Subject: RE: Singular Computing LLC v. Google LLC; Civil Action No. 1:19-cv-12551 FDS

Counsel,

Are you available to meet and confer about the issues in this letter tomorrow at 11am or 1pm PT?

Thanks,
Anna

From: Anna Porto
Sent: Monday, June 28, 2021 10:59 AM
To: singular@princelobel.com
Cc: kvp-singular <kvpsingular@keker.com>; wgs-singularv.google@wolfgreenfield.com; abhansali@kblfirm.com; mkwun@kblfirm.com
Subject: Singular Computing LLC v. Google LLC; Civil Action No. 1:19-cv-12551 FDS

Counsel,

Please see attached correspondence.

Best,
Anna

Anna Porto
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